

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DATAMOTION TEXAS, LLC.

Plaintiff,

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COMERICA BANK, COMERICA
INCORPORATED, et al.

KAISER PERMANENTE
VENTURES, LLC, et al.

Defendants.

[illegible]

Civil Action No. 2:15-cv-00894-JRG
LEAD CASE

JURY TRIAL DEMANDED

Civil Action No. 2:15-cv-00893-JRG
Consolidated Case

DECLARATION OF BOB JANACEK

I, Bob Janacek, declare under penalty of perjury as follows:

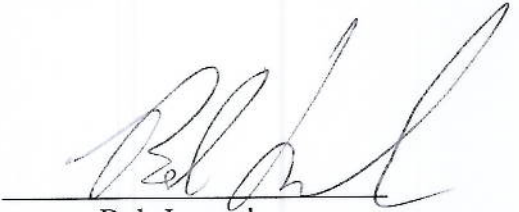
- (1) My name is Bob Janacek. I am over the age of twenty-one (21) years, and I am competent to testify on the matters stated herein. I am the Chief Technology Officer and Co-Founder of Datamotion, Inc. In connection with my work with DataMotion, Inc., I have personal knowledge of the facts and statements in this declaration and declare that each of the facts is true and correct.
- (2) All relevant documents evidencing conception and reduction to practice of the patents-in-suit are located in DataMotion, Inc.'s New Jersey offices.
- (3) All relevant documents related to the prosecution of the patents-in-suit are located in DataMotion, Inc.'s New Jersey offices or in New York in the offices of the attorneys that prosecuted the patents-in-suit.
- (4) DataMotion, Inc. has developed, marketed and sold a product known as SecureMail, which I understand embodies both of the '248 and '967 Patents.

(5) Documents related to the development, marketing and sale of DataMotion, Inc.'s SecureMail product are located in DataMotion, Inc.'s New Jersey office.

(6) I expect to be called as a witness in this matter. If called, I would willingly appear in the Eastern District of Texas.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 24, 2015 in Florham, New Jersey.



Bob Janacek